

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE

DILIGENT ENTERPRISE MANAGEMENT,
LLC,

Plaintiff,

v.

Civil Action No. 25-689-CFC

AML GLOBAL ECLIPSE, LLC, DWC PINE
INVESTMENTS I, LTD., ALAN KLAPMEIER,
JAMES CARROLL, STEVE SERFLING, RJ
SIEGLE, and MIKE WYSE,

Defendants.

JOINT STATEMENT PURSUANT TO LOCAL RULE 81.2

Pursuant to Rule 81.2 of the Local Rules of the United States District Court for the District of Delaware, Plaintiff Diligent Enterprise Management, LLC (“Plaintiff”), and defendants AML Global Eclipse, LLC, DWC Pine Investments I, LTD., Alan Klapmeier, James Carroll, Steve Serfling, RJ Siegle, and Mike Wyse (collectively, the “Defendants”) hereby submit the following joint statement identifying all pending matters which require judicial action.

Procedural Background

1. ONE Aviation Corporation (“ONE Aviation”) and certain of its affiliates (collectively, the “Debtors”) filed bankruptcy cases that are currently pending in the United States Bankruptcy Court for the District of Delaware (the “Bankruptcy Court”) under lead case *ONE Aviation Corp., et al.*, Case No. 18-12309 (JKS).

2. On May 27, 2025, Judge Caproni, District Judge for the Southern District of New York, granted Defendants' motion to transfer this action to this Court pursuant to 28 U.S.C. §§ 1334 and 1452, and denied Plaintiff's motion to remand to state court. (*See*, D.I. 60).

**The Only Pending Matter Is
Referral to the Bankruptcy Court**

3. The parties believe that the only matter currently requiring judicial action is the question of referral of this action to the Bankruptcy Court pursuant to this Court's *Amended Standing Order of Reference* dated February 29, 2012 (the "Standing Order"), which provides that "any or all proceedings arising under Title 11 or arising in or related to a case under Title 11 are referred to the bankruptcy judges for this district."

4. Defendants believe this matter should be automatically referred to the Bankruptcy Court pursuant to the Standing Order. Plaintiff does not contest that the Standing Order appears to apply to this matter.

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Dated: July 28, 2025

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CERTIFICATE OF SERVICE

I, Mary F. Caloway, hereby certify that on the 28th day of July, 2025, I caused a copy of the following document to be served upon the individuals on the attached service list via Electronic Mail.

Joint Statement Pursuant to Local Rule 81.2

/s/ Mary F. Caloway

Mary F. Caloway (DE Bar No. 3059)

AML Global Eclipse, LLC [v Diligent] et al Service List
Case 1:25-cv-00689-CFC
Document No. 4903-7657-9923
03 – Electronic Mail

ELECTRONIC MAIL

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